

04-08-10

BEFORE THE PUBLIC UTILITIES COMMISSION  
OF THE STATE OF HAWAII

PUBLIC UTILITIES  
COMMISSION

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FILED

---- In the Matter of ----

) Docket No. 2008-0273  
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PUBLIC UTILITIES COMMISSION  
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Instituting a Proceeding to Investigate the  
Implementation of Feed-in Tariffs  
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HAWAII RENEWABLE ENERGY ALLIANCE INFORMATION REQUESTS

ON THE

HAWAIIAN ELECTRIC COMPANY, INC. DRAFT TIER 3 TARIFFS

AND

CERTIFICATE OF SERVICE

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OF THE STATE OF HAWAII

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In accordance with the schedule for the instant docket as approved by the Commission in its Schedule Setting Order, filed on October 29, 2009, as modified by its "Order Granting Extension Request" filed on March 11, 2010, the Hawaii Renewable Energy Alliance ("HREA") respectfully offers its Information Requests ("IRs") to Hawaiian Electric Company, Inc. ("HECO") on their Draft Tier 3 Tariffs.

By way of introduction, HREA would like to recognize there has been some confusion among the Parties as to whether it was appropriate to file "formal" IRs on HECO's Draft Tier 3 tariffs, given that said tariffs have not been filed with the Commission as of this date. Nevertheless, HREA's interpretation is that this filing, per the instant docket schedule, is meant to be "formal." Thus, in the spirit of meeting the Commission's schedule and recognizing the lack of HECO's "formal" filing of the Tier 3 tariffs, we have crafted our IRs to be more general in nature.

**HREA-IR-1.** First, HREA would like to reference the following reports: (i) General Electric Multi-Area Production Simulation (MAPS) models for the utility electric systems on the islands of Oahu, Hawaii and Maui, (ii) General Electric Positive Sequence Load Flow (PSLF) models for the utility electric systems on the islands of Oahu, Hawaii and Maui, and (iii) Simulink model for the utility electric system on the island of Lanai. *Is there anything (data, information and analysis) to suggest that it is NOT prudent to proceed with the initial pilot implementation?* If so, please explain, because HREA does not believe HECO, to date, has produced such data, information and analysis.

HREA-IR-2. Given that HECO has not expressed concerns about the integration of FiT projects on Oahu in the pilot phase, HREA would like to focus on how potential “negative” impacts to the grids on Hawaii, Maui, Molokai and Lanai might be mitigated. For example:

1. would HECO propose to monitor the implementation of FiT, as well as Net Metering,
2. if so, how could that be accomplished,
3. in anticipation of potential “frequency regulation” problems in the pilot phase, is HECO willing to:
  - a. allow greater frequency excursions, if they are limited in duration, e.g., a few seconds to few minutes, and/or
  - b. if curtailment becomes necessary, due to the addition of new FiT projects, is HECO willing to compensate those systems that are curtailed, and thus preclude those projects, whether existing or new, from revenue loss.
4. in anticipating of full FiT implementation is HECO willing to consider:
  - a. implementing additional ancillary services during the pilot phase for frequency regulation and possible peak shaving on Hawaii and Maui,
  - b. working with all interested parties to prepare design and operating specifications for said ancillary services as a pilot project (s) on Hawaii and Maui, and
  - c. expediting a competitive bidding process to implement the additional ancillary service technologies, such as batteries, on a pilot-project basis.

Note: we believe this approach is warranted, not just as potential mitigation during the pilot FiT implementation, but also to test out ancillary service technologies for increased levels of renewable integration on our grids.

Date: April 8, 2010

  
President, HREA

## CERTIFICATE OF SERVICE

The foregoing HREA IRs were served on the date of filing by Hand Delivery or electronically transmitted to each such Party as follows.

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DATED: Honolulu, Hawaii, April 8, 2010